

CARLA A. McCAULEY (State Bar No. 223910)
 carlamccauley@dwt.com
 SEAN M. SULLIVAN (State Bar No. 229104)
 seansullivan@dwt.com
 DAVIS WRIGHT TREMAINE LLP
 865 South Figueroa Street, 24th Floor
 Los Angeles, California 90017-2566
 Tel.: (213) 633-6800 Fax: (213) 633-6899

ROBERT D. BALIN (*pro hac vice*)
 robbalin@dwt.com
 LACY H. KOONCE, III (*pro hac vice*)
 lancekoonce@dwt.com
 GEORGE WUKOSON (*pro hac vice*)
 georgewukoson@dwt.com
 DAVIS WRIGHT TREMAINE LLP
 1251 Avenue of the Americas, 21st Floor
 New York, New York 10020
 Tel.: (212) 489-8230 Fax: (212) 489-8340
 ATTORNEYS FOR PLAINTIFFS

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

CHINA CENTRAL TELEVISION, a China
 company; CHINA INTERNATIONAL
 COMMUNICATIONS CO., LTD., a China
 company; TVB HOLDINGS (USA), INC., a
 California corporation; and DISH
 NETWORK L.L.C., a Colorado corporation,
 Plaintiffs,

vs.

CREATE NEW TECHNOLOGY (HK)
 LIMITED, a Hong Kong company; HUA
 YANG INTERNATIONAL TECHNOLOGY
 LIMITED, a Hong Kong company;
 SHENZHEN GREATVISION NETWORK
 TECHNOLOGY CO. LTD., a China
 company; CLUB TVPAD, INC., a California
 corporation; BENNETT WONG, an
 individual, ASHA MEDIA GROUP INC.
 d/b/a TVPAD.COM, a Florida corporation;
 AMIT BHALLA, an individual;
 NEWTVPAD LTD. COMPANY d/b/a
 NEWTVPAD.COM a/k/a TVPAD USA, a
 Texas corporation; LIANGZHONG ZHOU,
 an individual; HONGHUI CHEN d/b/a E-
 DIGITAL, an individual; JOHN DOE 1 d/b/a
 BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN
 DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;
 JOHN DOE 5 d/b/a GANG YUE; JOHN
 DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7
 d/b/a GANG TAI WU XIA; and JOHN DOES
 8-10,

Defendants.

Case No.
CV 15-1869 SVW (AJWx)

**PLAINTIFFS' STATEMENT OF
 NON-OPPOSITION TO
 MOTION FOR LEAVE TO
 WITHDRAW AS COUNSEL
 FOR ASHA MEDIA GROUP,
 INC., AND AMIT BHALLA**

Date: May 16, 2016

Time: 1:30 p.m.

Courtroom: 6

Judge: Hon. Stephen V. Wilson

Complaint Filed: March 13, 2015

1 Plaintiffs China Central Television, China International Communications Co.,
 2 Ltd., TVB Holdings (USA), Inc., and DISH Network L.L.C. (collectively
 3 “Plaintiffs”) do not oppose the motion by the law firm Traverse Legal, PLC for leave
 4 to withdraw as counsel for Defendants Asha Media Group, Inc. (“Asha Media”) and
 5 Amit Bhalla.

6 **Plaintiffs respectfully request, however, that if the Court permits Asha**
 7 **Media’s counsel to withdraw, the Court strike the answer filed by Asha Media**
 8 **and Amit Bhalla [Dkt. No. 58], solely as to Asha Media.**

9 Asha Media, as a corporate defendant, cannot appear in this action *pro se*. *See*
 10 *Rowland v. California Men’s Colony*, 506 U.S. 194, 202, 113 S. Ct. 716, 121 L. Ed.
 11 2d 656 (1993), and C.D. Cal. L.R. 83-2.10.1). Moreover, Asha Media has
 12 acknowledged in its motion papers that it does not intend to defend itself in this
 13 action. *See* Dkt. No. 186, Memorandum of Points and Authorities, ¶ 6; Declaration of
 14 Mark G. Clark, ¶ 6.

15 Striking Asha Media’s answer will therefore allow Plaintiffs to move forward
 16 with requesting default and default judgment against Asha Media. *See Rojas v.*
 17 *Hawgs Seafood Bar, Inc.*, No. C08-03819 JF (PVT), 2009 U.S. Dist. LEXIS 41435,
 18 at *1 (N.D. Cal. May 5, 2009) (“When a corporation fails to retain counsel to
 19 represent it in an action, its answer may be stricken and a default judgment entered
 20 against it.”) (*citing Employee Painters’ Trust v. Ethan Enters., Inc.*, 480 F.3d 993
 21 (9th Cir. 2007) (holding that failure to retain counsel on behalf of corporation
 22 supported entry of default judgment); *Myers v. LHR, Inc.*, 543 F. Supp. 2d 1215,
 23 1217 (S.D. Cal. 2008) (addressing plaintiff’s motion for entry of default judgment
 24 and noting that court had previously granted plaintiff’s motion to strike corporate
 25 defendant’s answer for failure to retain counsel in order to appear in federal court);
 26 *see also Microsoft Corp. v. Marturano*, No. 1:06cv1747 OWW GSA, 2009 U.S. Dist.
 27 LEXIS 44450, at **2, 6 (E.D. Cal. May 27, 2009) (striking answer in advance of
 28 entering default judgment against defendant who persistently failed to participate in

1 the action); *United States v. Uptergrove*, No. 1:06-CV-1630-AWI-GSA, 2008 U.S.
 2 Dist. LEXIS 73489, at *3 (E.D. Cal. Aug. 13, 2008) (same). In light of the fact that
 3 Asha Media **cannot** continue to defend this action without counsel, and has stated on
 4 the record that it **does not** intend to defend this action, striking Asha Media's answer
 5 and allowing Plaintiffs to proceed immediately to default judgment is a necessary
 6 adjunct to defense counsel's withdrawal, and will promote judicial efficiency.

7
 8 DATED: April 22, 2016

DAVIS WRIGHT TREMAINE LLP
 CARLA A. McCAULEY
 SEAN M. SULLIVAN
 ROBERT D. BALIN (*pro hac vice*)
 LACY H. KOONCE, III (*pro hac vice*)
 GEORGE WUKOSON (*pro hac vice*)

12 By: /s/Sean M. Sullivan
 13 Sean M. Sullivan

14 Attorneys for Plaintiffs